

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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THELMA JONES, PRIYIA LACEY, FAISA  
ABDI, ALI ALI, RUKIYA HUSSEIN, LUCIA  
PORRAS, DAVID TROTTER-FORD, AND  
SOMALI COMMUNITY RESETTLEMENT  
SERVICES, INC.,

Case: 18-cv-1643 (JRT/HB)

Plaintiffs,

v.

CITY OF FARIBAULT,

Defendant.

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**AFFIDAVIT OF DEANNA KUENNEN**

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I, **DEANNA KUENNEN**, after first being duly sworn upon oath do hereby  
depose and state as follows:

1. I am the Director of the Department of Community & Economic  
Development for the City of Faribault. As part of my duties, I oversee the  
licensing of rental properties within the City.

2. The City of Faribault currently has 737 active licenses for rental  
properties. Some of these licenses are held by the same individual or entity.  
There are 384 individuals or entities that hold these 737 active licenses.

3. In order to properly identify the contact information for each  
Licensee, each license would need to be individually reviewed. Many of the

Licensees did not provide e-mail information, as that is not something the City requests as part of the application process.

4. As part of the City's Rental Licensing Ordinance, each Licensee is required to maintain an occupancy register that must be made available for review and copying by the City at all reasonable times. The Ordinance, however, does not permit the City to demand a Licensee reproduce such a register, or send it to the City. As result, the City would need to coordinate with 384 separate individuals or entities to acquire all of the occupancy registers.

5. While some Licensees may voluntarily send the occupancy register to the City upon request, there is no requirement they do so. As a result, the City may be required to personally go to the premises to view and copy the information of a substantial number of Licensees. I also anticipate there would be substantial follow-up required to obtain all of this information, as some Licensees may not immediately respond to the request and some Licensees may need to actually create the register.

6. I am unaware of the City ever requesting a Licensee produce their occupancy register, and conducting such activities are not a part of any staff member's regular duties. As such, a staff member would need to be assigned these tasks in addition to their regular duties.

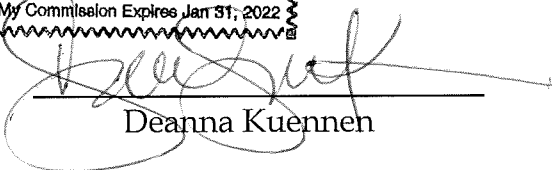
7. Even taking into consideration there are 384 individuals or entities that hold the 737 active licenses, I estimate it would take on average an hour interacting with all of these individuals and entities, including follow-up time, to acquire all of the occupancy registers.

8. Assuming the staff member (at an hourly rate of approximately \$30 an hour) assigned these tasks spends six hours a day accomplishing their regularly assigned duties, and two hours a day working on these tasks, plus an additional two hours of overtime, it would likely take months to assemble all the registers, at a substantial cost to the City.

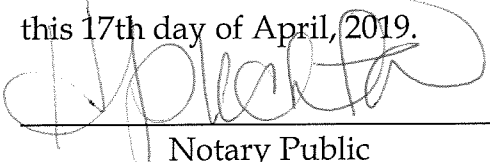
**FURTHER THIS AFFIANT SAYETH NOT.**

STATE OF MINNESOTA)  
): SS  
COUNTY OF RICE )



  
Deanna Kuennen

Subscribed and sworn to before me  
this 17th day of April, 2019.

  
Notary Public